

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-1 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as unauthorized entry into CO areas outside of the CLEC's collocated equipment space." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

**REPLY:** Verizon MA objects to this request on the grounds that the request is unreasonable on its face because of the overly broad scope of the data requested and the burden of compliance. This request has no defined time period, is not limited specifically to Massachusetts, and may seek data that is not readily available.

To comply fully with this request, Verizon MA would need to conduct an extensive and time-consuming search to determine whether and to what extent documents exist that are responsive to this request and then assemble that information. This would require a significant manual work effort since Verizon has not historically tracked the broad scope of information or level of detail in the form requested. Such an undertaking would consume considerable Company resources and impose an extraordinary burden on the Company that is disproportionate to any conceivable probative value that the information may have to the issues raised in this case. Thus, requiring such a burdensome exercise by Verizon is unreasonable and unwarranted for a full and fair adjudication in this proceeding.

**REPLY:** AG-VZ-1-1  
(cont'd)

Verizon MA further objects to this request on the grounds that the request seeks the production of documentation relating to third parties, *e.g.*, competitive carriers collocated in Verizon's central offices. Verizon is not at liberty to disclose this potentially competitively sensitive business information without the express consent of the parties involved.

Verizon MA also objects to this request to the extent that it would encompass information that is subject to the attorney/client privilege, or consists of attorney work product, including the mental impressions, conclusions, opinions, or legal theories of counsel concerning litigation or regulatory proceedings, or was prepared in anticipation of litigation, for use at trial or hearings, and/or for the purpose of settlement.

Notwithstanding its objections, Verizon MA responds as follows:

Currently, Verizon personnel and representatives of competitive local exchange carriers ("CLECs") report alleged security breaches in Verizon's collocated central offices ("CO") to Verizon's Collocation Care Center ("CCC") and/or its Security Department. Upon receipt of a telephone call (1-800-483-4116) or e-mail ([collocare@verizon.com](mailto:collocare@verizon.com)), the Verizon CCC generates a uniquely numbered trouble ticket that includes information relating to the initial contact. These tickets are then categorized and input into a database for record-keeping purposes. Incidents categorized as "central office security breaches" that pertain to alleged vandalism, break-ins, theft, sabotage, etc. are referred to the Security Department for follow-up investigation.

Likewise, Verizon personnel and CLEC representatives may directly report alleged security violations to Verizon's Security Department through its Security Central Desk Line (800 997-3287). Whether by referral from the CCC or via a direct contact, the Security Department establishes a case number and proceeds to investigate the matter (*e.g.*, gathers additional factual information, where necessary, and reviews each case to determine the appropriate action based on the circumstances, evidence and nature of the matter).

**REPLY:** AG-VZ 1-1  
(cont'd)

In response to this request, Verizon will produce readily available information relating to incidents reported to and documented by the CCC and Security Department for Massachusetts and other Verizon jurisdictions. This includes a summary report and individual tickets from the CCC for the former Bell Atlantic region from January 2001 to date (Attachment 1), and a summary report and investigative data from the Security Department for the entire Verizon footprint from January 2000 to date (Attachment 2). Verizon will subsequently produce calendar year 2000 data from the CCC for the former Bell Atlantic region to the extent that it becomes available.

Information relating to alleged collocation security violations prior to January 2000 was not routinely tracked or documented on a centralized or mechanized basis by Verizon or its predecessor companies. The only relevant, readily available data prior to January 2000 is contained in Verizon's October 12, 2000 Comments in FCC Docket No. 98-147 and CC Docket No. 96-98 as Attachment B-1 to the Declaration of Michael D. Poling. That attachment, together with available supporting documentation, is included as Attachment 3 to this request. Attachment 4 to this request contains available supporting documentation for the Washington state security violation that occurred on November 6, 2001, and is described on page 22, footnote 19 of Verizon MA's Direct Panel Testimony.

Due to the voluminous nature of the above material, Verizon MA will provide one copy to the Department only and will make a copy available for inspection by parties at the Company's offices at 125 High Street, Boston, Massachusetts, at a mutually agreeable time. For confidentiality reasons, Verizon has redacted from that documentation data relating to the identity (*e.g.*, name, address, telephone number) of carrier personnel and/or Company representatives.

VZ # 1

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-2 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, “ Verizon has documented such violations as ... theft and vandalism of CLEC equipment resulting from unauthorized access to a CLEC’s cage.” Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

**REPLY:** See Verizon MA’s Objection and Reply to AG-VZ-1-1.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-3 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... theft and vandalism of Verizon equipment in secured and unsecured areas of the CO." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-4 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... cables cut on frames." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-5 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... CLEC entry without an authorized identification badge or electronic access card." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-6 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ...CLEC entry with unauthorized use of another's identification badge or electronic access card." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-7 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... doors propped open or locks taped." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-8 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented ... such acts of vandalism as broken locks on doors or collocation cages." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the vandalism.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-9 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented ... such acts of vandalism as ... power systems disabled." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the vandalism.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-10 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... unauthorized CLEC testing on Verizon's side of the equipment." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-11 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ...evidence of drug use on the CO premises." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Robert D. Jacobs

**Title:** Director

**REQUEST:** Attorney General, Set #1

**DATED:** April 9, 2002

**ITEM:** AG-VZ-1-12 Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented ... other improper conduct." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the improper conduct.

**REPLY:** See Verizon MA's Objection and Reply to AG-VZ-1-1.